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MEMO ENDORSED

June 16, 2008

Hon. Charles L. Brieant
United States Courthouse
300 Quarropas St., Room 275
White Plains, NY 10601

Re: Newmark v. Lawrence Hospital Center, et al.
07-CV-2861 (CLB)

Charles L. Brieant
6/16/08 2008

May It Please The Court:

As counsel for Lawrence Hospital Center and Catherine Magone, defendants in the above-referenced matter, I write requesting an adjournment of defendants' deadline to file a stipulation of discontinuance, or else move for summary judgment, from June 27, 2008 until July 11, 2008. The parties have been diligently pursuing settlement discussions, but need additional time to negotiate a successful compromise. There have been no prior adjournments in this matter, and all parties consent to this request.

In the event that defendants move for summary judgment on July 11, all parties respectfully further request that plaintiff be permitted to file her opposition to summary judgment no later than August 11, 2008, and that defendants' reply be filed no later than August 25, 2008. The Court has previously scheduled oral argument on the motion for September 12, 2008 at 10:00 am.

Sincerely yours,

John Keil

John P. Keil (JK 2794)

cc: Drita Nicaj, Esq.
Counsel for plaintiff
Via Facsimile: 914-428-8916